

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN, et al.</b>	:	

**DEFENDANT BIJAN RAFIEKIAN'S MOTION  
FOR LEAVE TO FILE UNDER SEAL**

Mr. Rafiekian, through counsel, respectfully moves the Court for leave to file under seal a memorandum in response to the government's *ex parte* motion on July 3, 2019. Pursuant to Local Criminal Rule 49(D), Mr. Rafiekian is filing this motion with a non-confidential supporting memorandum and non-confidential proposed order.

Dated: July 5, 2019

Respectfully submitted,

/s/ \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 5th day of July 2019, true and genuine copies of Defendant Bijan Rafiekian's Motion for Leave to File Under Seal was sent via electronic mail by the Court's CM/ECF system to the following:

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/s/  
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